

REMARKS

Claims 1 – 9, 11, 13 – 18, and 27 - 50 are now pending in the application. The Examiner is respectfully requested to reconsider and withdraw the rejection(s) in view of the amendments and remarks contained herein.

REJECTION UNDER 35 U.S.C. § 102

Claims 27 – 32, 34, and 35 stand rejected under 35 U.S.C. § 102(b) as being anticipated by Pannekoek (U.S. Pat. No. 4,748,464). This rejection is respectfully traversed.

The Examiner alleges that Pannekoek discloses the claimed electrodes. Specifically, the Examiner alleges that Pannekoek discloses that “each pixel independently forms an electric field.” Applicants respectfully assert, however, that Pannekoek’s electrodes cannot form such an electric field. That is, as one electrode 4 of the first group is electrically connected one and only one electrode 2 of the second group (column 3, lines 11-14), when a voltage is applied to the electrode 4, the entire lines of the electrode 4 and electrode 2 connected to the electrode 4 are charged with the same voltage. As such, Applicants respectfully assert that the finding that the pixels independently form an electric field is erroneous. Applicants, therefore, further respectfully assert that the claimed invention is not anticipated.

REJECTION UNDER 35 U.S.C. § 103

Claims 1 – 5, 8, 9, 11, 13 – 16, 27 – 32, 34, 35, 37 – 40, and 42 - 44 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Vincent (U.S. Pat. No. 5,866,284) in view of Pannekoek. This rejection is respectfully traversed.

The Examiner alleges that Vincent may be modified to include the plurality of pixel electrodes taught by Pannekoek. Pannekoek, as stated above however, fails to teach the claimed electrodes. Moreover, Vincent also fails to teach the claimed electrodes. That is, referring to column 2, lines 13-27, which is the disclosure in Vincent upon which the Examiner relies for such a teaching, U.S. Patent No. 5,389,945 is described. The '945 patent discloses what the Examiner alleges are a plurality of electrodes. The electrodes described in the '945 patent, however, are in fact arranged in a line. Furthermore, the electrodes are arranged on a flat surface. As such, there is no suggestion or motivation to combine the electrodes disclosed in Vincent with the device as taught by Pannekoek. In contrast, the claimed invention, as amended, calls for two-dimensionally arranged electrodes on a curved part of a surface of a head for writing on electronic paper. Both Vincent and Pannekoek are silent with respect to this feature. The claimed invention, therefore, is not obvious.

Claims 6, 7, 17, 18, 33, 36, and 41 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Vincent in view of Pannekoek as applied to claims 1 – 5, 8, 9, 11, 13 – 16, 27 – 32, 34, 35, 37 – 40, and 42 – 44 above, and further in view of Haas et al. (U.S. Patent No. 6,100,909). The rejection is respectfully traversed.

These claims are dependent on the independent claims, addressed above. These claims are not obvious for at least the same reasons.

Accordingly, reconsideration and withdrawal of this rejection is respectfully requested.

CONCLUSION

It is believed that all of the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. Applicants therefore respectfully request that the Examiner reconsider and withdraw all presently outstanding rejections. It is believed that a full and complete response has been made to the outstanding Office Action, and as such, the present application is in condition for allowance. Thus, prompt and favorable consideration of this amendment is respectfully requested. If the Examiner believes that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at (248) 641-1600.

Respectfully submitted,

Dated: Jan 20, 2004

By: 

G. Gregory Schivley, Reg. No. 27,382
Bryant E. Wade, Reg. No. 40,344

HARNESS, DICKEY & PIERCE, P.L.C.
P.O. Box 828
Bloomfield Hills, Michigan 48303
(248) 641-1600

GGG/BEW/JAH